

ECF CASE
JUDGE CHIN

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

J & J SPORTS PRODUCTIONS, INC., as
Broadcast Licensee of the **May 5, 2007**
DeLaHoya/Mayweather Program

Plaintiff,

-against-

HAROLD C. GRAHAM, Individually, and as
officer, director, shareholder and/or principal of
REFLECTION BAR & LOUNGE INC. d/b/a
REFLECTIONS BAR & LOUNGE a/k/a
REFLECTIONS BAR AND GRILL,

and

REFLECTION BAR & LOUNGE INC. d/b/a
REFLECTIONS BAR & LOUNGE a/k/a
REFLECTIONS BAR AND GRILL

Defendants.

**NOTICE OF MOTION FOR
DEFAULT JUDGMENT**
Civil Action No. 07-CV-08855
HON. DENNY CHIN

PLEASE TAKE NOTICE that upon the affirmation of Julie Cohen Lonstein, sworn to
on the 4th day of January 2008 , in support of said application and the exhibits attached
thereto, Plaintiff moves this Court for an order granting the entry of default judgment against the
Defendants jointly and severally as follows:

**Against, HAROLD C. GRAHAM, Individually, and as officer, director, shareholder and/or
principal of REFLECTION BAR & LOUNGE INC. d/b/a REFLECTIONS BAR &
LOUNGE a/k/a REFLECTIONS BAR AND GRILL,**

- 1) under 605(e)(3)(C)(i)(II) a sum *in the discretion of the Court*, of up to TEN
THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum *in the discretion of the Court*, of up to ONE

HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for Defendant's willful violation of 605(a)

- 3) and under 605(e)(3)(B)(iii) *in the discretion of the Court*, costs and Attorney fees of SIX HUNDRED SIXTY FIVE DOLLARS AND SIXTY TWO CENTS (\$665.62)

**Against, REFLECTION BAR & LOUNGE INC. d/b/a REFLECTIONS BAR & LOUNGE
a/k/a REFLECTIONS BAR AND GRILL,**

- 1) under 605(e)(3)(C)(i)(II) a sum *in the discretion of the Court*, of up to TEN THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum *in the discretion of the Court*, of up to ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for Defendant's willful violation of 605(a)
- 3) and under 605(e)(3)(B)(iii) *in the discretion of the Court*, costs and Attorney fees of SIX HUNDRED SIXTY FIVE DOLLARS AND SIXTY TWO CENTS (\$665.62)

Dated: January 4, 2008
Ellenville, NY 12428

LONSTEIN LAW OFFICE, P.C.

By: /s/ Julie Cohen Lonstein
Julie Cohen Lonstein
Bar Roll No. JL8521
Attorney for Plaintiff
1 Terrace Hill; PO Box 351
Ellenville, NY 12428
Telephone: 845-647-8500
Facsimile: 845-647-6277